

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking on the)	
Commission's Own Motion into the Service)	R.02-12-004
Quality Standards for All Telecommunications)	(Filed December 5, 2002)
Carriers and Revisions to General Order 133-B.)	
_____)	

**OPENING COMMENTS OF VERIZON WIRELESS ON
ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

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Dated: May 14, 2007

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Pursuant to the March 30, 2007 Assigned Commissioner's Ruling and Scoping Memo of Commissioner Chong in the above-captioned proceeding ("ACR"), Verizon Wireless¹ submits the following comments concerning whether the Commission should require annual customer satisfaction surveys for wireless services.²

I. INTRODUCTION

Verizon Wireless applauds the ACR's revised approach in this docket – away from prescriptive service quality measures and reporting requirements. As Verizon Wireless explained in detail in earlier comments in this docket, the application of the previously proposed wireline-centric service quality measures to wireless carriers would make no practical sense and would tread into areas outside the scope of the Commission's jurisdiction.³ There is, similarly, no basis for the Commission to mandate customer satisfaction surveys. Aside from the many

¹ Verizon Wireless is the d/b/a for the following entities: Cellco Partnership (U-3001-C), Los Angeles SMSA Limited Partnership (U-3003-C), Verizon Wireless (VAW) LLC (U-3029-C), Fresno MSA Limited Partnership (U-3005-C), Sacramento Valley Limited Partnership (U-3004-C), GTE Mobilnet of California Limited Partnership (U-3002-C), GTE Mobilnet of Santa Barbara Limited Partnership (U-3011-C), Modoc RSA Limited Partnership (U-3032-C), California RSA No. 4 Limited Partnership (U-3038-C), Cal-One Cellular Limited Partnership (U-3036-C).

² Verizon Wireless has limited its comments to this single topic because it appears from the ACR that this is the only proposal that would apply to wireless carriers.

³ Comments of Verizon Wireless, Rulemaking 02-12-004 (filed Apr. 1, 2003); Reply Comments of Verizon Wireless, Rulemaking 02-12-004 (filed May 5, 2003).

practical problems with such a new mandate, the market for wireless services has already responded to the need for information on customer satisfaction. Several established and respected organizations include wireless services among the various products and services for which they conduct customer satisfaction surveys. These entities have significant expertise, experience, and resources to devote to this task. The market perceived a need and has been providing wireless customer satisfaction data long before the Commission began to consider this issue.

Before adopting any regulatory mandate, the Commission should ensure that such a requirement is necessary. Regulation exists largely to correct market failures and to curb the practices of companies who have market power. The existing availability of customer satisfaction data from a variety of sources is a market success, and no wireless service provider enjoys market power in California. The Commission is pursuing the laudable goal of determining when market forces, rather than regulatory oversight, will best ensure that consumers have access to quality telecommunications services on fair, just, and reasonable terms and conditions. This docket provides the Commission with another opportunity to recognize that the market, not regulation, is the most effective and efficient means of ensuring that information about competitive wireless alternative is available. Verizon Wireless respectfully asserts that the Commission can meet its stated goal in this docket – to have sufficient information “so that the Commission can assess whether the competitive market adequately protects California consumers”⁴ – without mandating any surveys of wireless customer satisfaction.

II. DISCUSSION

The ACR requests comment on whether the Commission should change its service quality rules to require “[a]nnual customer satisfaction surveys for all wireline and wireless

⁴ ACR at 3.

services.”⁵ Verizon Wireless strongly recommends that the Commission not require such surveys for wireless services. Many reliable sources of information on wireless customer satisfaction are currently available, including customer satisfaction surveys conducted by organizations that specialize in conducting such surveys. These information sources, moreover, are vastly superior to any survey that the Commission could conduct or commission a third party to conduct. The Commission need not, and should not, require any such studies.

A. A Commission Survey Would Needlessly Duplicate Existing Data on Wireless Customer Satisfaction.

The wireless industry is fiercely competitive. The Federal Communications Commission’s (“FCC’s”) periodic reports on the state of competition consistently confirm that fact.⁶ Knowledgeable sources in the private sector agree.⁷ This competition and the explosive growth in the wireless industry and the Internet have spawned a plethora of sources of all types of information for consumers about wireless services. A simple Google search for “wireless service” identifies many websites that explain how to choose a wireless service provider and evaluate and recommend available wireless service options.⁸ Several organizations that conduct wireless customer satisfaction surveys also maintain websites that provide information on the results of those surveys and recommendations for wireless providers whose customers are most satisfied with their service.⁹ Wireless carriers are themselves constantly monitoring customer satisfaction because market success is driven by it.

⁵ ACR at 6.

⁶ Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market. Conditions with Respect to Commercial Mobile Services, *Eleventh Report*, 21 FCC Rcd 10947, (2006).

⁷ See, e.g., www.wirelessadvisor.com (“there can be as many as ten or more different companies who can provide you with wireless communications in your area” and “each of these companies wants your business very badly”).

⁸ E.g., *id.*; www.letstalk.com; www.wirelessguide.org; www.cnet.com

⁹ E.g., www.jdpower.com; www.consumerreports.org; www.pcmag.com/article2/0,1759,2017602,00.asp

The opening comments of CTIA detail sources of information that are available on wireless customer satisfaction. Verizon Wireless concurs in those comments and will not repeat them here except to highlight three points. First, entities that currently conduct surveys of wireless customer satisfaction are well-established and experienced organizations. Two such organizations are J.D. Power and Associates (“J.D. Power”) and Consumers Union. J.D. Power was established in 1968 and relies on a staff of more than 750 to conduct surveys of customer satisfaction, product quality, and buyer behavior.¹⁰ Consumers Union, founded in 1936, publishes *Consumer Reports* and is an independent nonprofit organization with staff of more than 450 to engage in testing and customer satisfaction surveys of products and services, including wireless.

The second point that bears emphasis is that not only are there multiple reliable sources of information on wireless customer service satisfaction but also that some entities actually review, analyze, and rate those primary sources. One such entity is ConsumerSearch, which lists and ranks reviews of wireless service based on credibility in testing, evaluating, and identifying the best wireless plans. Its website also summarizes and analyzes the various reviews and provides its own recommendations for the best plans.¹¹ Thus not only are highly reputable wireless customer satisfaction surveys available, but “one stop shops” for summarizing, assessing, and rating those surveys are also available.

Finally, it is unclear from the ACR if the Commission is seeking access to information regarding customer satisfaction so it can evaluate the effectiveness of its regulatory regime or if the Commission is also concerned about the availability of such information to consumers. To the extent it is the latter, the existing sources of wireless customer satisfaction are readily

¹⁰ www.jdpower.com/corporate/about/overview/index.asp

¹¹ See www.consumersearch.com/www/electronics/cell-phone-plans/reviews.html

available to consumers at nominal or no cost. Anyone with an Internet connection – at home, work, school, public library, etc. – can access websites containing this information. Even subscription sources like *Consumer Reports* are publicly available in summary form¹² and are obtainable in full form to nonsubscribers at schools, public libraries or from friends or co-workers who are subscribers.

Commission involvement in the collection and dissemination of information on wireless service satisfaction simply is not necessary. A variety of organizations already provide a wealth of such information to consumers. No survey conducted or commissioned by the Commission could provide significantly more or better information than the data that is currently available. The Commission, therefore, should not impose a requirement that will have no appreciable benefit to California consumers.

B. Commission Involvement in Surveys of Wireless Customer Satisfaction Would Be Highly Problematic.

Assessing customer “satisfaction,” is as much an art as it is a science. One customer may be completely satisfied with a particular level of service while another customer may find such service wholly unacceptable. Wireless service in particular is susceptible to such dichotomies depending on the purposes for which the customer obtains such services and how the services are used. A customer who obtains wireless service to keep in touch with his children within a small geographic area, for example, will have different expectations and demands than a customer who uses her cell phone for business purposes throughout California or the country. Designing a study that takes these factors into account is extremely challenging and requires substantial expertise and experience in areas outside the traditional regulatory arena.

¹² *Id.*

The Commission can get an idea of the challenges involved in designing and conducting customer satisfaction surveys by reviewing how existing survey firms conduct such surveys.

J.D. Power, for example, describes its periodic study as follows:

This semiannual study measures customer satisfaction based on 42 specific service-related measures grouped into six key factors that impact overall wireless carrier performance. In order of importance, they are: call performance and reliability (32%); brand image (17%); service plan options (14%) billing (12%) and customer service (11%).¹³

Similarly, *Consumer Reports* polled about 43,000 magazine subscribers asking them to rate their wireless service for call quality, handling of calls and complaints, and billing problems. Both J.D. Power and Consumers Union report that they employ hundreds of specialists in survey techniques, statistical analysis, and consumer demographics to develop, implement, and evaluate these surveys. The Commission has neither the expertise nor the resources for such an undertaking. Moreover, the Commission's current service measures do not correspond to the areas that are most important to wireless service subscribers. "Installation," "maintenance," and "repair" are virtually meaningless terms in a wireless service world, where signal clarity, coverage, prices and availability are subscribers' primary concerns. Subscriber expectations of each type of service are also substantially different. One of the key features of wireless service is its mobility, a feature that is noticeably absent from wireline service and that presents unique customer satisfaction issues.

The Commission could not develop a single survey that will provide any meaningful comparison between customers' satisfaction with both wireline and wireless service providers. The services are different. Subscriber expectations of each type of service are different. To have any value, an assessment of customer satisfaction must take these differences into account and

¹³ www.jdpower.com/press-releases/pressrelease.aspx?id=2007058

must be undertaken on a service-specific basis. The Commission has extensive experience with the service quality measures for landline service listed in Exhibit A to the ACR, but that experience does not, and cannot, translate into expertise in the wholly different arena of wireless customer satisfaction.

Nor would the Commission be any better advised to commission a third party to conduct such a survey. Third parties *already* conduct these surveys. There is no reason to believe that a Commission-sponsored survey would be any more accurate, reliable, or unbiased than the surveys conducted by J.D. Power, *Consumer Reports*, and others. The Commission thus would be paying (or worse yet, requiring consumers directly or indirectly to pay) for a survey that, at best, duplicates surveys that are currently being done.

Indeed, *any* Commission involvement in wireless customer satisfaction surveys poses serious negative consequences. These survey results are necessarily comparative and are often used by the organization conducting the survey or a third party to recommend one or more wireless service providers based on the relative levels of customer satisfaction. It is beyond dispute that the Commission should not endorse (or be perceived to endorse) one service provider over any other(s). The Commission is charged with ensuring that telecommunications services are available to California consumers on fair, just, and reasonable terms and conditions where market forces cannot do so. That charge has never included recommending service providers, nor could the Commission provide such recommendations consistent with its obligation (and the obligation of all administrative agencies) to maintain both actual fairness and the appearance of fairness to the companies it regulates. The Commission could not effectively regulate in the public interest if it were even perceived to be favoring certain carriers.

Such an endorsement, however, would be inevitable if the Commission conducted or arranged for a third party to conduct customer satisfaction surveys of wireless carriers that are contained on the Commission's website. Little imagination is needed to envision the promotional efforts of the company whose customer satisfaction is ranked the highest by the government agency that regulates telecommunications service in California. Any Commission recommendation, whether actual or perceived, could have tremendous influence on the market. Consumers and the market, not the Commission, should determine which carriers are successful.

Less obvious but even more ominously, a Commission survey itself could unintentionally favor one carrier over another depending on how the survey is structured. The J.D. Power survey, as discussed above for example, includes an evaluation and weighting of the areas that consumers find to be the most important aspects of wireless service – assessments that have changed over time and directly impact the determination of overall customer satisfaction.¹⁴ A Commission-sponsored survey may weigh these factors differently or in an effort to appear to be neutral, could weigh all aspects of service equally. Any such determination, however, would invariably favor one carrier over another. A carrier with an extensive, reliable network that is having billing or image issues, for example, could have an overall customer satisfaction rating that is the same as, or even lower than, another carrier that has a less reliable network but no other issues – even though consumers place a higher value on network reliability. Even if the Commission study included no overall satisfaction rating but attempted to assess each service component separately, consumers would be left on their own to sort through how the various

¹⁴ See www.jdpower.com/press-releases/pressrelease.aspx?id=2007058 (“The study finds that the call performance and reliability factor has increased in importance from 26 percent of the overall satisfaction score in 2005 to 32 percent in 2007. Specifically, call quality issues such as echoes and timely notification of voice mail messages have received the most significant increase in importance. Subsequently, the customer service factor has become less critical in determining overall wireless satisfaction – declining from 17 percent in 2005 to 11 percent in the 2007 study.”).

factors inter-relate. A Commission-sponsored survey thus could actually confuse or mislead consumers – precisely the opposite of the Commission’s intent.

III. CONCLUSION

For the reasons stated above, the Commission should not adopt any requirement for wireless customer satisfaction surveys.

Respectfully submitted:

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Dated: May 14, 2007

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111-6533.

On May 14, 2007, I caused the following to be served:

OPENING COMMENTS OF VERIZON WIRELESS ON ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO

on the parties listed as "Appearance" and "State Service" in R.02-12-004 via electronic mail or U.S. mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

/s/ Judy Pau

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CALIFORNIA PUBLIC UTILITIES COMMISSION

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